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June 2, 2021

**Via ECF**

Honorable Judge Alvin K. Hellerstein  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

The Court previously rejected Third-Party Defendants' unauthorized letter (ECF No. 79) and ordered the parties to file motions or conform to the procedures described in Rule 2E of the Court's Individual Rules. See ECF No. 81. Rule 2E provides that "counsel shall describe their disputes in a single letter, jointly composed. Separate and successive letters will be returned, unread." R. 2E. The instant letter once again fails to conform to Rule 2E and is therefore returned. The Clerk shall terminate ECF No. 82.

**Re: Pizarro v. Euros El Tina Restaurant, et al.**  
**Case No.: 20-cv-5783 (AKH)**

So Ordered.  
/s/ Hon. Alvin K. Hellerstein  
June 4, 2021

Dear Judge Hellerstein,


I write on behalf of my clients, Third Party Defendants Jose E. Castro and Eladio Castro Productions, Inc., with the objection of counsel for Plaintiff Maria Jose Pizarro ("Plaintiff") and the consent of counsel for Defendants/Counterclaim/Crossclaim Plaintiffs Euros El Tina Restaurant and Billiards Corp., Santiago Quezada, and Santiago Quezada Jr. ("Defendants") to request an extension of time for discovery to complete solely as it relates to discovery of claims against my clients. Plaintiff's counsel objects to this request to the extent that it seeks an extension of a portion of fact discovery and not all fact discovery and submits that any submission of fact discovery should relate to all claims or none.

Based on a review of the docket, I understand that this is the second request for extension of discovery, the first having been granted on May 4, 2021 extending the deadline from June 1, 2021 until June 5, 2021. This extension would only affect the conference scheduled for June 25, 2021 at 10am. The Parties can be available any day the week of July 26, 2021 for the conference to be rescheduled.

Third Party Defendants Jose E. Castro and Eladio Castro Productions, Inc. filed their Answer on May 4, 2021 and have now been served with demands by Defendants along with deposition notices. We also have served discovery demands on Defendants. The extension is necessary as we have not yet received all discovery exchanged by the other parties and could not adequately prepare for depositions and trial in such a short period of time. We ask for an extension of forty-five (45) days for discovery related only to the claims against my clients, Third Party Defendants Jose E. Castro and Eladio Castro Productions, Inc.

Thank You for Your Honor's time and attention to this matter. Should You have any additional questions or require additional submission we remain at Your disposal.

Respectfully Submitted,



/s/Jesse C. Rose

Jesse C. Rose

cc: All Counsel. (Via ECF)